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EPA REVIEW WORKSHEET OF
STATE HAZARDOUS WASTE INSPECTION REPORT

Facility: Arrcom, Inc.

Inspection Date: Nov. 25, 1987

Address: Highway 53
3 miles west of Rathdrum
Rathdrum, ID 83858

Inspector: Kathryn Sewell

ID Number: IDDO00800961

Date Received: June 3, 1988

Report Date: June 3, 1988

COMPLIANCE SUMMARY FROM INSPECTION REPORT

Summary of Violations

This facility is still in non-compliance with an EPA Compliant and Compliance Order issued April 27, 1983. This inspection documented that the facility is in the final stages of a CERCLA clean-up action. Until the clean-up is completed and closure is certified the facility is still in non-compliance as a TSD facility.

Summary of Enforcement Response

The facility is still under an existing EPA RCRA Order and is being cleaned-up under CERCLA. No additional actions appear to be necessary to bring this facility into compliance.

Adequacy of Inspection Documentation (Pictures, Narrative, Checklists)

The narrative report, checklist and photographic documentation are adequate.

Timeliness and Appropriateness of Enforcement Action (see State and EPA Enforcement Response Policies)

No compliance action will be taken.

Questions about Findings, and Unresolved Issues

None

Other Comments and Recommendations

None

Steve Provant
REVIEWER - NAME

July 1, 1988
DATE OF REVIEW

Steve Provant
(SIGNATURE)

SP0440D

USEPA RCRA



3009281



STATE OF IDAHO

DEPARTMENT OF HEALTH
AND WELFARE

DIVISION OF ENVIRONMENTAL QUALITY
450 West State Street
Boise, ID 83720-9990

June 3, 1988

JUNE 11, 1988

MEMORANDUM

TO: Steve Provant
FROM: Katie Sewell *KAS*
SUBJECT: RCRA Compliance Inspection Report

Attached is a Hazardous Waste Management Act/RCRA Compliance Inspection Report for the Arrcom, Inc. facility. We do not plan to take action at this time. Oversight is being conducted in the Superfund Section.

Please contact me if you have any questions or concerns.

KAS/jd

Attachment

HWMA/RCRA COMPLIANCE INSPECTION NARRATIVE REPORT

Date of Inspection:

November 25, 1987

Facility:

Arrcom, Inc. (Drexler Enterprises, Inc.)

EPA Identification Number:

IDD000800961

Address:

Highway 53
3 miles West of Rathdrum
Rathdrum, Idaho 83858

Report Prepared By:

Kathryn A. Sewell
Hazardous Waste Compliance Officer
Idaho Department of Health and Welfare (IDHW)
Hazardous Materials Bureau (HMB)

Inspection Participants:

Kathryn A. Sewell, IDHW/HMB

Background Information:

Arrcom submitted a Part A RCRA application to EPA on November 17, 1980 for on-site storage, treatment and/or disposal of hazardous waste. The facility initially qualified for interim status under RCRA to store and treat ignitable, corrosive and spent solvent hazardous wastes. On June 20, 1982, an inspection conducted by EPA at the facility found that hazardous waste and/or hazardous waste constituents had been stored, spilled and/or disposed on-site.

An EPA Complaint and Compliance Order issued on April 27, 1983 required Arrcom to submit a Part B RCRA permit application within 180 days of their receipt of the Order. On May 27, 1983, the facility owner submitted a letter to EPA stating that the facility would not be used for the handling of hazardous waste in the future. The letter also clarified the intention of the facility owner not to submit a RCRA Part B permit application.

also removed. A fenced area contained drums generated by the EPA removal action. There were 12 drums in one group with an accumulation date of June 1, 1987 marked hazardous waste. These drums had exceeded the 90 day storage limit for RCRA generators. (Note: EPA removed the drums on February 16, 1988.)

There were approximately 30 drums in another group covered with plastic. The drums were marked PCBs. I was not able to see the accumulation date on these drums.

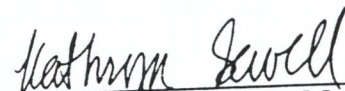
I observed the monitor wells located on either side of the fenced area and the grounds around the site. There appeared to be several areas where sludge still remained on the surface of the soil. These areas had not been addressed during the soil removal process.

Summary:

As has been recorded in past inspection reports, the facility is out of compliance with every applicable RCRA and HWMA regulation.

Recommendation:

Since the facility is on the National Priority List, is no longer operating, and is being addressed under the Superfund program, it is recommended that no further RCRA inspections by the State of Idaho be conducted at this facility. A State employee working under the Superfund program is responsible for project oversight at this facility.



Kathryn A. Sewell
Hazardous Waste Compliance Officer

KAS/jd

Attachments: EPA Checklist
Photographs

Note: Completion of this inspection report was postponed in anticipation of the final EPA report detailing cleanup activities at the Arrcom site. That report has not been received by the State of Idaho and has been delayed several times. As a result, this report was completed without inclusion of information from the cleanup report.

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

- I. General Information
- II. Small Quantity Generator (SQG) Regulations (40 CFR 261.5)
- III. Generator Regulations (40 CFR 262)
- IV. Transporter Regulations (40 CFR 263)
- V. Treatment, Storage, and Disposal (TSD) Interim Status Regulations (40 CFR 265)
- VI. Treatment, Storage, and Disposal (TSD) Permit Status Regulations (40 CFR 264)

I. General Information (Date Revised March 8, 1983)

- A. Inspection: Type of Inspection: Evaluation (✓); Sampling ();
Record Review (); Special (); Follow-up;
Date/Time Inspection commenced: November 25, 1987

B. Facility

EPA/State ID IDD000800961

Name & Addresses ARRCOM, Inc.

1. Mailing:

2. Location: 3 miles W. of Rathdrum
Highway 53

Rathdrum, ID 83858

Contact: none

Telephone: () none at facility

C. Compliance Summary

	<u>IN</u>	<u>OUT</u>	<u>N/A</u>
RCRA (Statute)	()	()	()
40 CFR 270	()	()	()
40 CFR 124	()	()	()
40 CFR 261.5	()	()	()
40 CFR 262	()	()	()
40 CFR 263	()	()	()
40 CFR 264 (Permit)	()	()	()
40 CFR 265	()	()	()

Specific Violations: see narrative report

D. Inspector

Name (Print) Kathryn Sewell Title: Hazardous Waste Compliance Officer
Signature Kathryn Sewell
Organization IOHw - Hazardous Materials Bureau
Phone (208) 334-5879

E. Inspection Participants:

<u>Name</u>	<u>Title</u>	<u>Phone #</u>
<u>Kathryn Sewell</u>	<u>IOHw/Hmb</u>	<u>(208) 334-5879</u>

F. Notification/Permit Information

1. Started operation: _____ Date: _____
2. Notification filed: YES NO Date: _____
3. Part A application filed: (YES) NO Date: 11/17/80
4. Part B called/Date Due (YES) NO Date: 4/27/83
5. Part B application: YES NO Date: _____
6. Changes in Notification or Part A: facility owner notified EPH on 5/27/83 of intention not to submit Part B Permit
7. Facility's classified as:

Generator	<u>(4)</u>
Transporter	<u>(1)</u>
Treatment facility	<u>(4)</u>
Storage facility	<u>(4)</u>
Disposal facility	<u>(4)</u>
Small quantity generator	<u>(1)</u>
Recycler	<u>(1)</u>
Less than 90 day storage	<u>(4)</u>
Wastewater treatment unit exemption (WWTU)	<u>(1)</u>
Elementary neutralization unit exemption (ENU)	<u>(1)</u>

8. Does facility have a Part A withdrawal request in ?
YES (NO)

Status _____

Comments: site abandoned in 1982

G. Hazardous Waste Generation (HW) and Management (List EPA Waste Code)

1. General information

a. Characteristic HW (DXXX)?

- (1) Ignitability D001
- (2) Corrosivity D002
- (3) Reactivity _____
- (4) EP Toxicity _____

b. Listed HW?

- (1) HW from non-specific sources (FXXX)
F002, F005
- (2) HW from specific sources (KXXX)

c. Discarded commercial chemical product(PXXX or UXXX)

- (1) PXXX _____
- (2) UXXX _____

d. Has facility petitioned to delist waste? YES NO

Date: _____ Comments: _____

e. Does facility qualify for WWTU or ENU? YES NO

Comments: _____

f. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste?

- (1) What are the wastes generated? none currently generated - facility abandoned & EPA generated
- (2) How was the hazardous waste determination made wastes for each waste (i.e., lab analyses, knowledge of during waste streams or processes, waste listed in Part CERCLA 261)? removal action

Comments: _____

(3) Are records available on the determination(s)?

YES

NO

facility abandoned, no records available

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/Part A application?

YES NO NA
an EPA removal had removed waste: and
If so explain. contaminated soil

2. Specific information

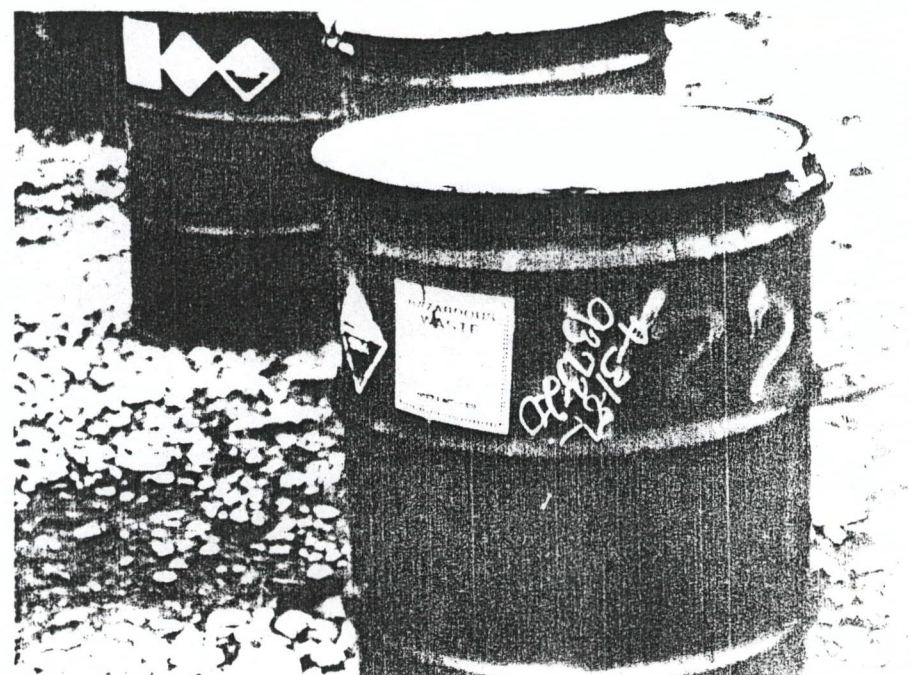
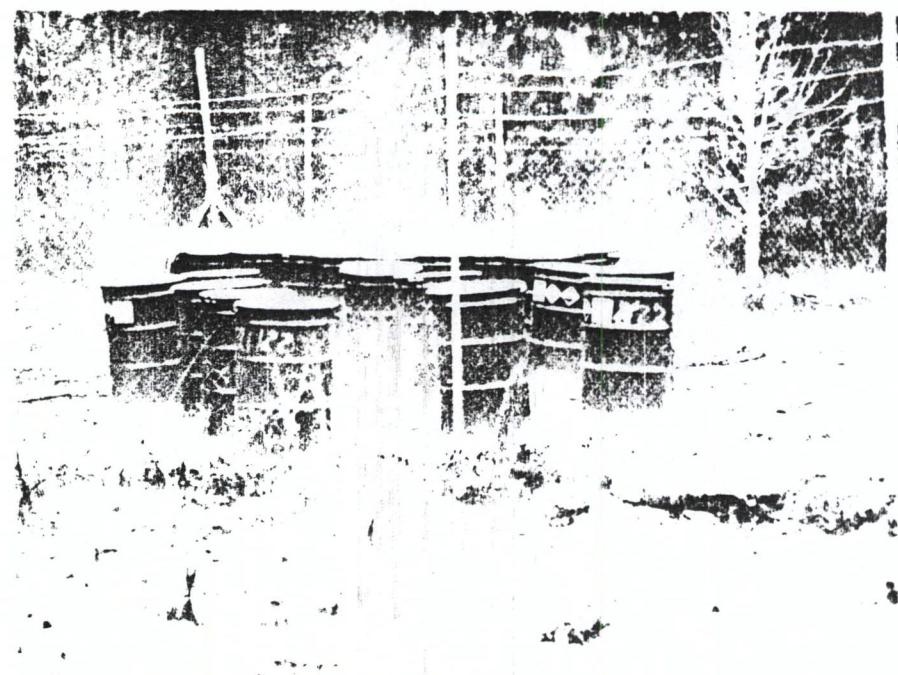
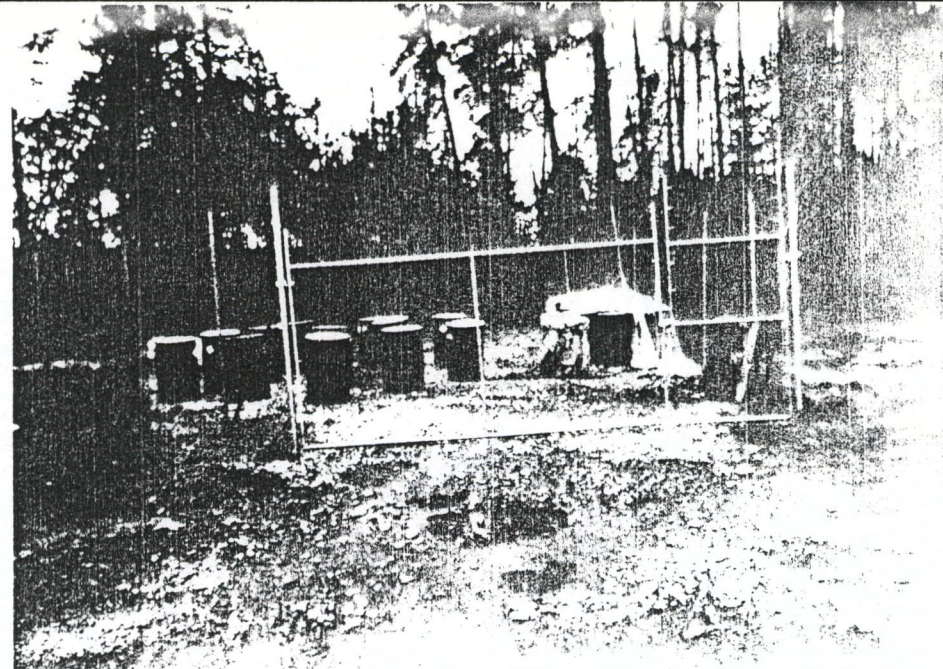
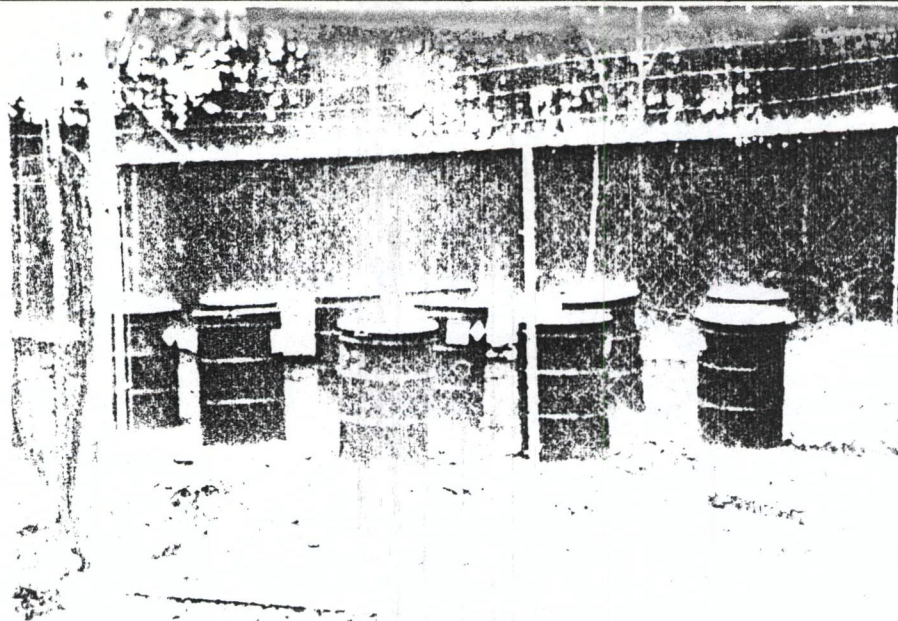
Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)

- a. EPA HW Code
- b. HW description
- c. Composition (including sampling requirements)
- d. Process producing waste:
- e. Rate of waste production
- f. Time of storage
- g. Waste handling prior to disposal
- h. Waste disposal practice and manifest
- i. Reporting and recordkeeping
- j. Comments

H. Miscellaneous Notes:

The facility was abandoned in 1982. Two removal actions have been conducted by EPA under the CERCLA program. The second cleanup in May 1987 removed all structures and contaminated soil. The final report from EPA on the removal has not been received to evaluate the closure. Facility essentially no longer exists.
(see narrative report)

TSD checklist is not attached - it is not applicable to this non-existent facility. All regulations are violated.



Arrcom, Inc. (Drexler Enterprises, Inc.) 2
Rathdrum, ID
100000800961

November 25, 1987
K. Sewell, IDHW/HMB

photo of locked fenced area containing
drums of contaminated soil removed
by EPA action

Arrcom, Inc. (Drexler Enterprises, Inc.) 4
Rathdrum, ID

100000800961
K. Sewell, IDHW/HMB
November 25, 1987

photo of drum label

Arrcom, Inc. (Drexler Enterprises, Inc.) 1
100000800961

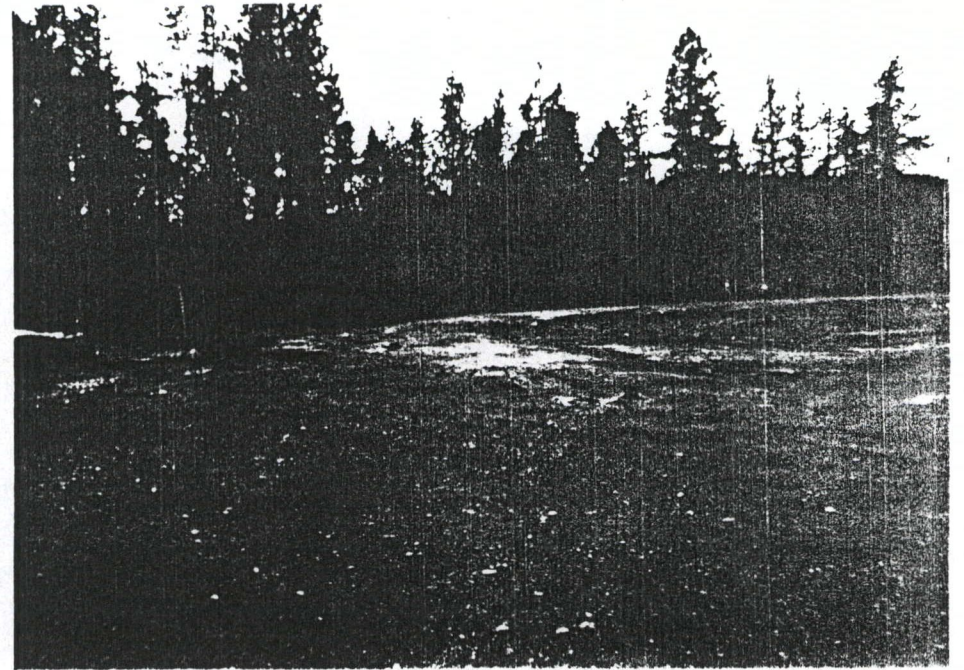
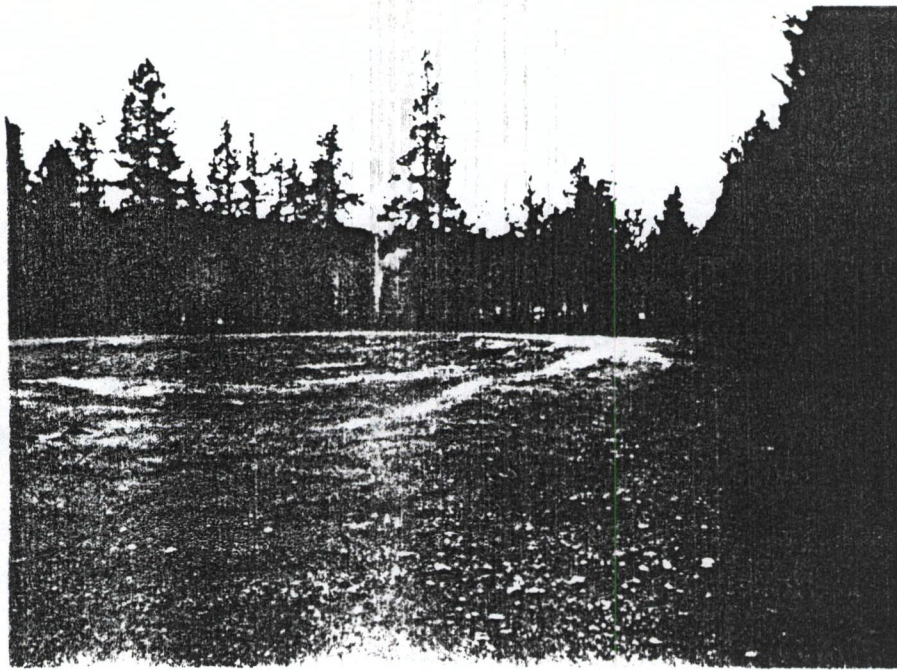
November 25, 1987
K. Sewell, IDHW/HMB

photo of drums containing contaminated
material excavated by EPA removal
action

Arrcom, Inc. (Drexler Enterprises, Inc.)
Rathdrum, ID
100000800961

November 25, 1987
K. Sewell, IDHW/HMB

photo of drums in fenced area



Arrcom, Inc. (Drexler Enterprises, Inc.)
Rathdrum, ID

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100000800961

November 25, 1987
K. Sewell, IDHW/HMB

photo showing area after EPA
removal

Arrcom, Inc. (Drexler Enterprises, Inc.)
Rathdrum, ID

100000800961

November 25, 1987
K. Sewell, IDHW/HMB

photo of former location of tanks and
other structures showing removal

Arrcom, Inc. (Drexler Enterprises, Inc.)
Rathdrum, ID

100000800961

K. Sewell, IDHW/HMB
November 25, 1987

view of fenced (locked) area enclosing
drums of hazardous waste & PCB
waste
